

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re: FTX TRADING LTD., *et al.*¹
Debtors

Chapter 11

Case No. 22-11068 (JTD)
(Jointly Administered)

Hearing Date: March 20, 2024 at 10:00 a.m. (ET)
Obj. Deadline: March 7, 2024 at 4:00 p.m. (ET)

**CANYON'S JOINT MOTION AND PROPOSED ORDER
FOR RESTRICTION OF CONFIDENTIAL INFORMATION**

Pursuant to 11 U.S.C. § 105(a) and the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Privacy Order”), Canyon ESG Master Fund, L.P., Canyon IC Credit Master Fund L.P., and Canyon-ASP Fund, L.P. (collectively “Canyon”), hereby request that the Court direct the Clerk of the Court to restrict public access to *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7910], *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7911], and *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7912] (collectively the “Notices”) filed on February 23, 2024, as they

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

contain the contact and confidential information of a Creditor who is a natural person, which is subject to the protections afforded by the Privacy Order.

At the time of filing, versions which did not redact the confidential contact information of a Creditor who is a natural person were inadvertently submitted, and no waiver of the protections of the Privacy Order was intended.

The correct redacted versions of the Notices were filed on February 23, 2024 at *Notice of Transfer of Claim Other Than for Security* [D.I. 7933], *Notice of Transfer of Claim Other Than for Security* [D.I. 7934], and *Notice of Transfer of Claim Other Than for Security* [D.I. 7935] (collectively the “Amended Notices”).

CONCLUSION

For the foregoing reasons, Canyon respectfully moves that the Court issue an Order directing the Bankruptcy Court Clerk to restrict from public view the previously filed Notices and permanently replace them with the Amended Notices.

Dated: February 23, 2024

Respectfully submitted,

/s/ Thomas S. Kessler

Thomas S. Kessler²
tkessler@cgsh.com
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
T: 212-225-2000
F: 212-225-3999

Attorney for Canyon

² Out-of-state counsel appearing pursuant to Local Rule 9010-1(e)(iii).

UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re: FTX TRADING LTD., *et al.*¹
Debtors

Chapter 11
Case No. 22-11068 (JTD)
(Jointly Administered)
Hearing Date: March 20, 2024 at 10:00 a.m. (ET)
Obj. Deadline: March 7, 2024 at 4:00 p.m. (ET)

**NOTICE OF CANYON'S JOINT MOTION AND PROPOSED ORDER
FOR RESTRICTION OF CONFIDENTIAL INFORMATION**

PLEASE TAKE NOTICE that Canyon ESG Master Fund, L.P., Canyon IC Credit Master Fund L.P., and Canyon-ASP Fund, L.P. (collectively "Canyon") have filed *Canyon's Joint Motion for Restriction of Confidential Information* (the "Motion").

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, are to be filed on or before **March 7, 2024 at 4:00 p.m. (Prevailing Eastern Time)**. At the same time, you must serve a copy of the objection or response on the undersigned attorneys.

PLEASE TAKE FURTHER NOTICE that if any responses are timely filed in accordance with this Notice, a hearing on the Motion will be held on **March 20, 2024 at 10:00 a.m. (Prevailing Eastern Time)** before the Honorable John T. Dorsey at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 5th Floor, Courtroom No. 5, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

Dated: February 23, 2024

Respectfully submitted,

/s/ Thomas S. Kessler

Thomas S. Kessler²
tkessler@cgsh.com
CLEARY GOTTLIEB STEEN & HAMILTON LLP
One Liberty Plaza
New York, New York 10006
T: 212-225-2000
F: 212-225-3999

Attorney for Canyon

² Out-of-state counsel appearing pursuant to Local Rule 9010-1(e)(iii).

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re: FTX TRADING LTD., *et al.*¹

Debtors

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Re: D.I. __

**ORDER GRANTING CANYON'S JOINT MOTION
AND RESTRICTING CONFIDENTIAL INFORMATION**

Upon consideration of the joint motion (the “Motion”) of Canyon ESG Master Fund, L.P., Canyon IC Credit Master Fund L.P., and Canyon-ASP Fund, L.P. (collectively “Canyon”) pursuant to 11 U.S.C. § 105(a) and the *Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief* [D.I. 545] (the “Privacy Order”) to restrict public access to *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7910], *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7911], and *Notice of Transfer of Claim Other Than for Security and Evidence of Transfer of Claim and Waiver of Notice* [D.I. 7912] (collectively the “Notices”); the Court having found that

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that good cause exists to approve the relief sought in the Motion, it is hereby ordered that:

1. The Motion is granted as set forth herein.
2. The Clerk of the Court is directed to permanently restrict public access of the Notices and permanently replace them with the Amended Notices (as defined in the Motion).

IT IS SO ORDERED.